

May 14, 2020

FILED

My name is Janice S. Smith. I am responding for the **second time in 11 months** ~~11 months~~ **11**

Ch 11

Case No. 17-12560 (BLS)

Adversary Processing

Case No. 19-50760 (BLS)

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

I am the sole beneficiary for my late husband account.

John P. Smith 7/24/45 – 11/6/2018

Along with my Financial Advisor we have completed all necessary paperwork for this transition. Mr. Andrew Caine has spoken to my adviser, Greg Smith, on numerous occasions. As well as emailing.

I have attached my prior response to the Court sent in December 2019. Please note copy of Return to sender card.

My response remains the same. Please see attached documents.

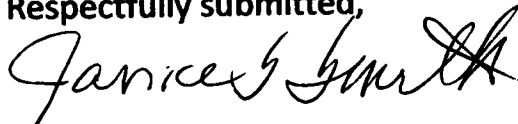
I would note at this time. There is a typo in my husband's name on your behalf. He is listed as **John B. Smith...this is INCORRECT!** His name was

John P. (Paul) Smith.

Please assure this is corrected.

Feel free to contact me through my Advisor listed in the following documents.

Respectfully submitted,



Janice S. Smith

Widower and Beneficiary of
John Paul Smith

Cc United States Bankruptcy Court Wilmington, DE
Pachulski Stang & Jones LLP

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

United States Bankruptcy
824 N. Market Street
3rd FL
Wilmington, DE 19801



9590 9402 4584 8278 4516 88

2. Article Number (Transfer from service label)

7018 0680 0000 5262 5969

PS Form 3811, July 2015 PSN 7530-02-000-0053

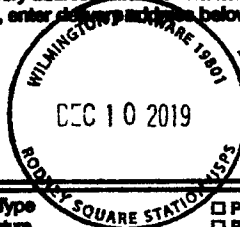
A. Signature

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

12/10

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail® | |
| <input type="checkbox"/> Insured Mail Restricted Delivery | |

Domestic Return Receipt

To Michael Goldberg Liquidating Trustee of the Woodbridge Liquidation Trust:

Per the attached correspondence from Andrew Caine (Exhibit C) back in May-July 2019 I am not accepting the judgment of \$137,000 that you are alleging against my deceased Husband John P Smith. John P Smith passed away on 11/06/2018 and at the time of his passing had the following assets in his name.

An IRA with American General that had been annuitized into a 5-year payout

An IRA with Jackson National with a balance of approximately \$116,246

An IRA with Provident Trust Group- Balance of \$51,108 that was invested in 1st Global Capital which has also filed for Chapter 11 Bankruptcy Proceedings (so these funds are not actually there).

And a 9 month non-qualified Land Lease with Resolute Capital. — \$60,000

John had 2 original investments with Woodbridge, 1 of them an IRA for \$50,000 which was refunded to him and then subsequently invested in 1st Global Capital which has filed for Bankruptcy. He also had a second non-qualified investment of \$61,000. I (his Widow) have attached a breakdown of the expenses that I have had to pay since John passed away.

Final expenses for John totaled \$27,432 and I have also spent an additional \$50,430 on living expenses since John's passing. The total expenses for myself since John's passing in November 2018 have totaled \$77,862.49. The total expenses I have paid are more than the original non-qualified investment John had, and the qualified investment John had in his IRA is involved in another Chapter 11 proceeding so those assets are gone.

I do not accept this judgement and per Andrew Caine's original correspondence dated May 30th 2019 (which is attached Exhibit C) if there are no assets the Trustee would not pursue any affirmative action. As you can see by the attached Exhibits there is truly nothing left.

 12/1/2019

signed

EXHIBIT A Death Certificate

EXHIBIT B- EXPENSES CALCULATIONS

Exhibit B

Expenses

Janice Sue Smith

November 2018-July 2019

John P. Smith (deceased 11/6/2018)

Final Expenses for John P. Smith

Arrangements	\$26,252.15
Highland Park Cemetery, Hockemeyer & Miller Funeral Home, Forest Lawn Funeral Home, Memorial Services, Travel Expenses	
Medical Transport	\$1,179.87
Shands Cares	
<i>Sub Total A</i>	<i>\$27,432.02</i>

Household Expenses

Citizens First Mortgage	\$9,910.10
Home mortgage, taxes & insurance	
Village Community Development	\$1,679.28
Water, sewage, garbage, amenity fees	
Duke Energy	\$818.73
Electric	
ATT/Direct TV/Comcast/Sirius XM	\$4,586.49

Transportation

Honda Financial Services 2018 Odyssey	\$8,652.00
Maintenance & Repairs	\$2,453.64
Golf Cart maintenance & repair	\$256.27

Professional Services

Attorney Fees	\$1,537.50
Tipton Law, Hunt Law	

Insurance

Medical	\$4,010.66
Florida Blue, State Farm	
Automobile	\$718.00
Progressive	
Golf Cart	\$264.00
Foremost	

Home Maintenance & Repairs	\$10,072.51
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Dean's Lawn Services, Village Pest Control, Southern Outdoors, Professional Lawn and Landscaping, Egner's Exterior Cleaning, Aesthetic Concrete, SunKool, Tri-County Landscaping, Michael Reeves Window Cleaning, Classic Carpentry, Great Lakes Carpet and Tile, Blocker Furniture, Lowe's/Amazon)

Medical Expenses	\$5,471.29
------------------	------------

Affinity E-health, Lake Eye Associates, Dr R. Camogliano, Dr J. Duke, Cardiac and Vascular Consultants, Santa Fe Surgery Center, Santa Fe Anesthesia, Quest Diagnostics, Lake Gastroenterology, McQuinn Family Dentistry, Lake Medical Imaging, Rx Plus Pharmacy, CVS Pharmacy

<i>Sub Total B</i>	\$50,430.47
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Grand Total	\$77,862.49
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Expenses for Janice S. Smith from November 2018- July 2019,
including final expenses for John P. Smith

EXHIBIT C- EMAIL CORRESPONDANCE with ANDREW CAINE and my Financial Advisor Greg Smith

12/5/2019

Gmail

EverTrue Financial Services Mail - Re: Woodbridge/Smith

Greg Smith <gsmith@evertruefw.com>

Re: Woodbridge/Smith

1 message

Greg Smith <gsmith@evertruefw.com>

To: Andrew Caine <acaine@pszjlaw.com>

Cc: Susie Smith <jsmith1831@comcast.net>

Thu, Jul 25, 2019 at 5:29 PM

Andrew,

While I understand that the Liquidation Trust has a responsibility to try and recover assets that were paid prior to the bankruptcy filings in this case there is nothing left from John's estate. As I previously stated his assets when he passed only had \$50,000 in Non-qualified assets; which his Woodbridge investment was non-qualified funds. Susie (John's wife Janice Susie Smith) has already spent \$27,432.02 on final expenses along with an additional \$50,430 (on living expenses plus legal bills) since his passing for a grand total of \$77,862.49 which is more than the \$50,000 that John had in his estate at passing.

We will not accept a forfeiture of Susie's (Janice Susie Smith's) Woodbridge claim as those assets are IRA assets and are therefore protected from Creditors.

IRA assets are legally protected from creditors and therefore her claim should not be considered as part of a resolution here.

See attached PDF outlining Susie's expenses since Nov 2018.

Greg Smith

Owner

gsmith@evertruefw.com



EverTrue
FINANCIAL SERVICES

807 Airport North Office Park.

Fort Wayne, IN 46825

(260) 490-8822 - Phone

(260) 888-4427 - Cell

(260) 490-8833 - Fax

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<https://mail.google.com/mail/u/0/?ik=b44f231ade&view=pt&search=all&permthid=thread-P%3A1637545747073392805%7Cmsg-s%3A4331592458570910574&siml=msg-s%3A4331592458570910574...> 1/7

Exhibit

12/5/2019

EverTrue Financial Services Mail - Re: Woodbridge/Smith

dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify the sender and permanently delete all copies that you may have.

On Thu, Jul 18, 2019 at 4:31 PM Andrew Caine <acaine@pszlaw.com> wrote:

Thanks Greg. The Trustee understands, but also has a responsibility to collect as much as possible for the thousands of defrauded investors who have received nothing to date, unlike John Smith, who was paid in full with interest, totaling \$137,000. The Trustee will be reasonable and practical, but should get some recovery and, as previously offered, is willing to work with waiver or reduction of the outstanding claim as value. I look forward to hearing from you.

Andrew Caine

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 310.772.2357

Tel: 310.277.6910 | Fax: 310.201.0760

acaine@pszlaw.com

vCard | Bio | LinkedIn



Los Angeles | San Francisco | Wilmington, DE | New York | Costa Mesa

From: Greg Smith [mailto:gsmith@evertruefw.com]

Sent: Thursday, July 18, 2019 1:27 PM

To: Andrew Caine

Subject: Re: Woodbridge/Smith

Andrew,

Susie is working to provide me with details for what John's final expenses were after he passed plus her monthly living expenses.

According to what John had at passing there was only \$50,000 in non-qualified assets and I know she had to spend at least \$25,000 of that on his final expenses. So there is not much here.

Greg Smith

Owner

gsmith@evertruefw.com



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On Thu, Jul 18, 2019 at 3:21 PM Andrew Caine <acaine@pszllaw.com> wrote:

Thank you. Do you have any proposal to resolve the matter?

Andrew Caine

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 310.772.2357

Tel: 310.277.6910 | Fax: 310.201.0760

acaine@pszllaw.com

vCard | Bio | LinkedIn



Los Angeles | San Francisco | Wilmington, DE | New York | Costa Mesa

12/5/2019

EverTrue Financial Services Mail - Re: Woodbridge/Smith

From: Greg Smith [mailto:gsmith@evertruefw.com]
Sent: Thursday, July 18, 2019 6:46 AM
To: Andrew Caine
Cc: Susie Smith
Subject: Re: Woodbridge/Smith

The snapshot for John Smith at his passing in November 2018 is below.

~~FAA~~ Annuitized AIG - Balance approx \$100,884
~~FAA~~ Jackson - Balance approx \$116,246
~~FAA~~ Provident - \$51,108 invested in 1st Global Capital which is also in Chapter 11 Bankruptcy Proceedings
9 month non-qualified Land Lease investment- \$50,000

Greg Smith

Owner

gsmith@evertruefw.com



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12/5/2019

EverTrue Financial Services Mail - Re: Woodbridge/Smith

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On Thu, Jun 27, 2019 at 9:28 PM Andrew Caine <acaine@pszlaw.com> wrote:

Hi Greg. Sorry for the time mix up. Thanks for your message.

Don't spend too much time on the financial statement -- we are looking for a snapshot to start with. I look forward to seeing what you put together.

Andy

Andrew Caine

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 310.772.2357

Tel: 310.277.6910 | Fax: 310.201.0760

acaine@pszlaw.com

vCard | Bio | LinkedIn



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From: voicemail@pszlaw.com [mailto:voicemail@pszlaw.com]
Sent: Thursday, June 27, 2019 1:07 PM
To: Andrew Caine
Subject: Voice Message from 92604908822 ("92604908822") on 6/27/19 1:03 PM for 2357

Voice Message from 92604908822 ("92604908822") on 6/27/19 1:03 PM

12/5/2019

EverTrue Financial Services Mail - Re: Woodbridge/Smith

"Hi Andy this is Greg Smith we had actually I got your voicemail from a little bit ago we had actually picked 4:00 is our time to talk. So I was not available earlier when you called. Just now getting back to you here in regards to Woodbridge and Suele Smith here. Just a side note they are not related to me John and Suele Smith they are just happen to be a client that I inherited. I just started working with them here back in our Suele last summer. So sounds like we need to kinda compose a detailed financial report here for you for our John the state as of November when he passed away and I guess we'll send that document over to use and you kinda break down of expenses and what was received and what was in his."

Attachment(s):

- Voice Message (71 sec)

Delete this message from my Voice Mailbox
Mark this message read in my Voice Mailbox
View/Edit my EVM Settings

Mailbox currently contains 6 New and 4 Old messages.

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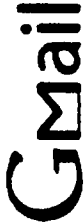
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Greg Smith <gsmith@evertruefw.com>

FW: John P Smith (deceased)

1 message

Andrew Caine <acaine@pszjlaw.com>

To: Greg Smith <gsmith@evertruefw.com>, Susie Smith <jsmith1831@comcast.net>

Cc: "Beth D. Dassa" <bdassa@pszjlaw.com>

Thu, May 30, 2019 at 3:05 PM

Thank you for your email. I am sorry to hear about your husband's passing.

In my prior correspondence with Greg, he refers to a remaining claim against Woodbridge. Please identify that claim for me. Also, please send an informal financial statement listing any remaining assets and liabilities of your husband's estate. If there is truly nothing, ~~then the Trustees will not discuss to further any estate recovery.~~

I look forward to hearing from you.

Andy Caine

Andrew Caine

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 310.772.2357

Tel: 310.277.6910 | Fax: 310.201.0760

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From: Greg Smith [mailto:gsmith@evertruefw.com]

Sent: Thursday, May 30, 2019 11:48 AM

To: Andrew Caine

EverTrue Financial Services Mail - FW: John P Smith (deceased)

Cc: Susie Smith

To Andrew Caine;

I am writing in regards to a letter I received from you dated March 25th, regarding my husband John P Smith's Woodbridge Investment. The letter seems to be asking for our original principal balance of \$100,000 plus interest back; along with approximately \$26,000 additional interest. I do not have these funds anymore. These funds were used to pay for my husbands care, daily living expenses, and the final expense costs for his remains. His DOD was 11/06/2018.

I have attached a copy of his Death Certificate if you require it for your records.

Respectfully,


Sent from my iPhone
Susie Smith

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614K



Greg Smith <gsmith@evertruefw.com>

FW: John P Smith (deceased)

1 message

Andrew Caine <acaine@pszlaw.com>
To: Greg Smith <gsmith@evertruefw.com>, Susie Smith <jsmith1831@comcast.net>
Cc: "Beth D. Dassa" <bdassa@pszlaw.com>

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I look forward to hearing from you.

Andy Caine

Andrew Caine
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acaine@pszlaw.com
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Sent: Thursday, May 30, 2019 11:48 AM
To: Andrew Caine

EverTrue Financial Services Mail - FW: John P Smith (deceased)

12/5/2019

Cc: Susie Smith
Subject: John P Smith (deceased)

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I have attached a copy of his Death Certificate if you require it for your records.

Respectfully,
Janice S. (Susie) Smith


Sent from my iPhone
Susie Smith

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